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Honorable Timothy W. Dore
Chapter 7
Hearing Location: Seattle, Rm. 8106
Hearing Date: March 8, 2024
Hearing Time: 9:30 a.m.
Response Date: March 1, 2024

8 UNITED STATES BANKRUPTCY COURT
9 WESTERN DISTRICT OF WASHINGTON
10 AT SEATTLE

11 In re:

12 WIRELESS ADVOCATES, LLC

13 Debtor.

Case No. 23-10117-TWD

**NOTICE OF HEARING CHAPTER 7
TRUSTEE'S MOTION FOR
AUTHORITY TO ABANDON AND
DESTROY RECORDS AND APPROVE
PAYMENT OF DISPOSITION
COSTS**

14 TO: WIRELESS ADVOCATES, LLC, LLC, Debtor;
15 AND TO: UNITED STATES TRUSTEE;
16 AND TO: SPECIAL NOTICE LIST;
AND TO: PARTIES ENTITLED TO NOTICE UNDER CASE MANAGEMENT ORDER

17 PLEASE TAKE NOTICE that a hearing has been scheduled on **March 8, 2024, at 9:30**
18 **a.m. (PT)** before the Honorable Timothy W. Dore, United States Bankruptcy Judge, in Courtroom
19 8106, 700 Stewart Street, Seattle, WA, 98101 on the Chapter 7 Trustee's Motion for Authority to
Abandon and Destroy Records and Approve Payment of Disposition of Costs (the "Motion").

20 By this motion, the Trustee seeks authority, pursuant to 11 U.S.C. § 554, to abandon and
21 destroy hardcopy records stored at the Record Xpress of California LLC d/b/a Access ("Access")
22 facility in SeaTac, Washington, and to pay for the costs of such destruction or disposition of the
23 records of One Hundred and Fifty Thousand Dollars pursuant to a bid for destruction services from
24 Access. These records have no value to the estate because the vast majority of the records are more
than five years old, and the Trustee is unaware of any litigation or other estate matters for which the
records could be relevant. The Trustee has investigated a number of options for disposition of these
records and the bid of Access is the most favorable option available to the estate.

25 PLEASE TAKE FURTHER NOTICE that copies of the Motion and related documents may
26 be (1) reviewed and copied at the Clerk of the United States Bankruptcy Court, 700 Stewart Street,

NOTICE OF HEARING ON CHAPTER 7 TRUSTEE'S
MOTION FOR AUTHORITY TO ABANDON AND
DESTROY RECORDS. - 1

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1 Seattle, WA 98101 or (2) may be obtained by submitting a written request to Ms. Denise Lentz,
2 Paralegal, K&L Gates, LLP, 925 Fourth Avenue, Suite 2900, Seattle, WA 98104-1158, Email:
denise.lentz@klgates.com.

3 PLEASE TAKE FURTHER NOTICE THAT IF YOU OPPOSE the Motion, you must file
4 your written objection NO LATER THAN **March 1, 2024**. Objections must be filed with the Court,
700 Stewart Street, Seattle, WA, 98101, and a copy delivered to:

5 Ruby Nagamine
6 K&L Gates, LLP
925 Fourth Avenue, Suite 2900
7 Seattle, Washington 90104

8 PLEASE TAKE FURTHER NOTICE that in accordance with Local Bankruptcy Rule 9013-
9 1(d)(7), failure to timely file and serve an objection to the Motion may be deemed by the Court an
admission that any opposition to the Motion is without merit. Further, pursuant to Local Bankruptcy
10 Rule 9013-1(e), failure to appear at the hearing on the Motion may be deemed by the Court to be an
admission that any opposition to the Motion is without merit. Further, pursuant to Local Bankruptcy
11 Rule 9013-1(f), if no opposition to the Motion is timely filed and served, the Court may either (a)
grant the Motion by default at the hearing, or (2) grant the Motion prior to the hearing on the
12 Trustee's ex parte presentation of a proposed order accompanied by proof of service and a
declaration that no objection to the Motion was timely received.

13 Dated this 15th day of February, 2024.

14 K&L GATES LLP

15 /s/ Ruby A. Nagamine

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21 *Attorneys for Virginia Burdette, Chapter 7*
22 *Trustee*

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24
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26 NOTICE OF HEARING ON CHAPTER 7 TRUSTEE'S
MOTION FOR AUTHORITY TO ABANDON AND
DESTROY RECORDS. - 2

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1 **CERTIFICATE OF SERVICE**

2 The undersigned declares as follows:

3 That she is a practice assistant in the law firm of K&L Gates LLP, and on February 15, 2024,
4 she caused the foregoing document to be filed electronically through the CM/ECF system which
caused Registered Participants to be served by electronic means, as fully reflected on the Notice of
Electronic Filing.

5 I declare under penalty of perjury under the laws of the State of Washington and the United
6 States that the foregoing is true and correct.

7 Executed on the 15th day of February, 2024 at Seattle, Washington.

8 /s/ Denise A. Lentz
Denise A. Lentz